## HOLWELL SHUSTER & GOLDBERG LLP

Blair E. Kaminsky (646) 837-5139 bkaminsky@hsgllp.com

November 21, 2023

## **VIA ECF**

Hon. Edgardo Ramos United States District Judge for the Southern District of New York 40 Foley Square, Room 619 New York, NY 10007

Re: Nampiaparampil v. N.Y.C. Campaign Fin. Bd., et al., No. 23-cv-6391

Dear Judge Ramos:

Pursuant to Your Honor's Individual Rules and Local R. 1.4, I write to respectfully request a pre-motion conference in connection with Holwell Shuster & Goldberg's ("HSG's") intended motion to withdraw as counsel for Plaintiff Dr. Devi Nampiaparampil.

Dr. Nampiaparampil, through her attorneys at HSG, filed a complaint in the above-captioned matter on July 24, 2023. ECF No. 1. On November 20, 2023, Dr. Nampiaparampil informed the undersigned attorneys that she wishes to terminate HSG's representation in this matter. HSG informed Dr. Nampiaparampil that it would accordingly move to withdraw as counsel.

The undersigned attorneys understand that we have been discharged, in accordance with New York Rule of Professional Responsibility 1.16(b)(3). In light of the foregoing, the undersigned intend to move to withdraw as counsel in this matter under Local Rule 1.4. The undersigned have informed counsel for Defendants of the forthcoming motion and asked whether Defendants intend to oppose it. Defendants' position is as follows: "Defendants do not object to Plaintiff's counsel's application to withdraw given the circumstances. However, Defendants are anxious that Plaintiff take appropriate steps to ensure that no unreasonable delay is caused by the withdrawal of her counsel, especially with respect to Defendants' pending motion to dismiss."

We are available for a pre-motion conference at the Court's convenience. We respectfully remind the Court that Plaintiff's opposition to Defendants' Motion to Dismiss is due December 1, 2023. Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Blair E. Kaminsky

Blair E. Kaminsky Brian T. Goldman Arian Soroush

CC (by ECF): Counsel for Defendants

CC (by email): Plaintiff Dr. Devi Nampiaparampil